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8 **UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

9 Sterling Hardisty Taylor,

10 Plaintiff,

11 v.

12 UNITED STATES OF AMERICA and  
13 DOES I to X, inclusive, collectively,

14 Defendants.  
15

Case No. 2:22-cv-00435-APG-BNW

**Stipulation and Order to  
Extend Time to File a Response  
(Fourth Request)**

16 Plaintiff and Defendants through undersigned counsel, hereby submit this  
17 stipulation to extend the date for Defendants to file and serve a responsive pleading to  
18 Plaintiff's First Amended Complaint (ECF No. 33, filed 1/31/23).

19 The current deadline for the United States to respond to the Plaintiff's Complaint is  
20 April 12, 2023.

21 The parties, through undersigned counsel, stipulate and request that the Court  
22 approve a four-weeks extension of time, from April 12, 2023, to May 15, 2023 for the  
23 United States of America to file a response to the First Amended Complaint. This is the  
24 fourth request for an extension of time. The additional time is needed because of a heavy  
25 case load given due to two AUSA vacancies in the Civil Division and multiple upcoming  
26 court-ordered deadlines. In addition, the parties are in the process of obtaining additional  
27 information regarding the allegations raised in the First Amended Complaint which is  
28 necessary to provide a responsive pleading.

1 Therefore, the parties request that the Court extend the deadline for the United States  
2 to answer or otherwise respond to **May 15, 2023**. Due to the stipulation, the parties also  
3 request that the Court extend the deadline for the Rule 26(f) conference from April 19, 2023,  
4 to **June 5, 2023** and the deadline to submit the Joint Discovery Plan and Scheduling Order  
5 to **June 19, 2023**.

6 This stipulated request is filed in good faith and not for the purposes of undue delay.

7 Respectfully submitted this 5th day of April 2023.  
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9 GALLIAN WELKER &  
10 ASSOCIATES, L.C

JASON M. FRIERSON  
United States Attorney

11 /s/ Nathan E. Lawrence  
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18 **IT IS SO ORDERED:**

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21 **UNITED STATES MAGISTRATE JUDGE**

22 **DATED:** April 6, 2023  
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